

REMARKS REGARDING THE AMENDMENTS

Claim 1 has been cancelled without prejudice for presentation in this or a later submitted application.

Claim 2 has been rewritten in independent form to explicitly include the limitation of base Claim 1. This amendment of Claim 2 is to bring it into compliance for form and is not made for reasons of patentability.

Claim 4 has been amended to correct its dependency so that it now depends from Claim 2. This amendment of Claim 4 is to bring it into compliance for form and is not made for reasons of patentability.

Claim 5 has been amended to clarify the scope of the subject matter. This amendment of Claim 5 is to bring it into compliance for form and is not made for reasons of patentability.

Claim 9 has been amended to correct its dependency so that it now depends from Claim 2. This amendment of Claim 9 is to bring it into compliance for form and is not made for reasons of patentability.

Claim 13 has been amended to clarify the scope of the subject matter. This amendment of Claim 13 is to bring it into compliance for form and is not made for reasons of patentability.

Claims 17-20 have been cancelled without prejudice for presentation in this or a later submitted application.

Claims 21-25 have been added to more clearly set out certain elements of Applicants' invention as suggested by the Examiner. Support for each of these new claims is found throughout the originally filed application, including the drawings and original claims. No new matter has been added.

Figure 4 has been amended by the addition of the lead line and element number 419 to the third spray device element shown and described now in amended Paragraph [44]. No new matter has been added by these amendments.

RESPONSE TO CLAIM REJECTIONS UNDER 35 U.S.C. § 112

Claims 1-3, 9, 14-16 were rejected under 35 U.S.C. § 112 as being incomplete for “omitting essential elements”; *an inlet, an outlet and cartridge filter bores* were identified as the omitted elements. Claim 1 has been cancelled without prejudice. Applicants respectfully traverse this rejection as to the remaining claims on the basis that these elements (*an inlet, an outlet and cartridge filter bores*) are inherent in the terms set forth in the claims. For example, “multi-round filter housing” (found in the preamble of Claims 1 and 14, and by dependency, in all of the above-rejected claims) and “base assembly” (likewise, an element of each rejected claim) particularly point out to a person having ordinary skill in the art the scope of Applicants’ invention regarding the above-identified “omitted elements.”

As set forth in the specification, and as discussed below, Applicants’ invention consists of a single piece base assembly (*i.e.* an integrated base assembly) that has eliminated the prior-art need for a two-piece construction which consisted of a separate removable cartridge plate and a separate multi-stage base assembly. Accordingly, Applicants have not identified “*an inlet, an outlet and cartridge filter bores*” as essential elements that therefore must be included as a limitation for the claims to be complete. To the extent that these three elements are necessary to define the scope of Applicants’ invention in Claims 1-3, 9 and 14-16, they are inherent in the terms set forth in the claims as originally presented for examination. Accordingly, in light of these clarifying comments and those contained below, Applicants respectfully request that this rejection be withdrawn and that Claims 2-3, 9 and 14-16 be passed to allowance.

Claims 1-16 were rejected under 35 U.S.C. § 112 second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. The examiner has stated that “it is unclear what Applicants

intend by the recitation “integral” in the context used. Furthermore, it is unclear how this language differs (if at all) from the term “integrated” as used in the claim.”

The examiner correctly notes that Applicants have eliminated the separate cartridge plate of the prior art, however, the structure, purpose and function of the prior art cartridge plate have been subsumed (*i.e.* integrated) into the one-piece base assembly of Applicants’ invention. Applicants have set forth this relationship by identifying the incorporation of the structure of the prior art cartridge plate into its novel one-piece base assembly by referring to the incorporated structure as being “integral”, and the resulting one-piece assembly as being “integrated.” Applicants’ use of these terms is consistent with the normal ordinary meaning of these words and no special or contrary meaning is intended by Applicants. For example, Paragraph [6] lines 5-7 state that “the present invention generally includes an integrated filter housing with a one-piece tooled base assembly.” Paragraph [7] lines 1-3 reiterates this disclosure as being preferable, such that “the filter housing preferably includes an integrated base that is machined or tooled from a single piece of material.” The disclosure of Paragraph [7] lines 3-5 continues by clarifying that the structure normally associated with a prior art cartridge plate is included in the integrated base, such that “the integrated base preferably includes a plurality of machined bores adapted to accept longitudinal filter cartridges inserted therein.” Also, the first sentence of Paragraph [8] introduces the term “integrated cartridge plate” such that “the integrated cartridge plate may also include a recessed upper face” thereby tying the term to the structure previously described.

Further in the application, Applicants have clearly identified these elements and their structural relationship. For example, under “Brief Description of the Drawings”, Paragraph [15], Applicants have identified this figure as showing a side cross-section of “an integrated base assembly.” With reference to Figure 2, a single piece is illustrated there, and is identified therein as item 205 (base assembly) in the corresponding text of Paragraphs [32], [33], [36], [37], [38], [40], [41] and [43]. With specific reference to the text in Paragraph [37], item 205 is preceded by the statement “the base and cartridge plate are an integrated, single structure 205,” thus clearly setting forth Applicants’ use of “integrated” to mean a single structure including an integral cartridge plate (*i.e.* a structure that is part of a larger unit). Also shown in

Figure 2 is a portion of the one-piece base assembly labeled item 212. This item 212 is consistently identified within the corresponding text of Paragraphs [33] and [34] as an “integrated cartridge plate 212.” Applicants recognize that the claim term is “integral cartridge plate” and, in using the adjective (integral) to describe the structure normally associated with a cartridge plate, Applicants were attempting to be precise with their terminology.

Webster’s Ninth New Collegiate Dictionary (1983), defines “**integrate**” as “1. *To form, coordinate or blend into a functioning or unified whole: UNITE*; 3. (a) *to unite with something else* (b) *to incorporate into a larger unit*. Also, “**integral**” is defined as “1. *essential to completeness: constituent*.” Thus, Applicants “integrated base assembly” is a base assembly that has been formed into a functioning unified whole that includes the constituent integral cartridge plate – an element essential to the completeness of the larger unit, *i.e.* the integrated base assembly. Applicants submit that their use of the terms “integrated base assembly” and “integral cartridge plate” was clear, precise and definite in the claims as originally presented. Nonetheless, Applicants have cancelled Claim 1 without prejudice and have rewritten Claim 2 in independent form to further clarify this aspect of Applicants’ invention. Additionally, Applicants are presenting new Claims 21-23 to further define certain aspects of the base assembly. In light of the above clarifying remarks, amendments and new claims, Applicants respectfully request that this rejection be withdrawn and that all remaining claims (*i.e.* Claims 2-16 and 21-25) be passed to allowance.

Claims 11 and 12 were stated to be unclear in their recitation of the word “style.” With reference to Paragraph [27], Applicants use the term “style” as part of the hyphenated term “gasket-style sealant” in characterizing an O-ring. The use of this language in dependent Claims 11 and 12 is meant to further limit Claim 4 from which they depend in the following manner. First, Claim 4 does not recite any type or style of gasket seal, so both Claims 11 and 12 add this element as a further limitation to the previously recited elements of Claim 4. Second, Claim 11 limits the number of seals to only one (1). Finally, Claim 12 further limits Claim 11 such that the one (1) gasket-style seal is an O-ring. Applicants respectfully submit that, in light of the above clarifying remarks, and with further reference to Paragraph [20] and Figure 1, item 160, that Applicants’ use of the word “style” as part of the term “gasket-style seal” is clear. Applicants

respectfully request that this objection be withdrawn and that Claims 11 and 12 be passed to allowance.

Claim 13 has been identified as being unclear by Applicants' use of the negative limitation "surfaces which do not include a substantially horizontal surface." In Paragraph [4], Applicants had identified "horizontal surfaces ... which promote the collection or 'pooling' of both unfiltered product (on the upper face of the cartridge plate) and filtered product (on the lower face of the collection chamber)" as a prior art limitation. Further, Paragraph [25] states that "Following use, filtrate collects ('pools') on the horizontal aspect of the lower face of the collection chamber 125 and unfiltered product collects on the flat upper face of the cartridge plate 110."

With reference to Paragraph [33], item 214 is identified as a recessed upper face (*e.g.* in the shape of a frustoconical indentation); items 218 and 220 are identified as apertures (*e.g.* cartridge filter bores and inlet/outlet manifolds); and in Paragraph [41], item 240 is identified as a dome that extends vertically. None of these elements contains a horizontal surface that promotes the collection or pooling of filtered or unfiltered product. Accordingly, Applicants' intention in Claim 13 is to further limit the elements of Claim 4 by adding the limitation that none of the antecedent elements recited therein contain a horizontal surface which promotes the pooling of product, either filtered or unfiltered. To further clarify the scope of Claim 13, Applicants have amended the claim to remove the term "substantially" as a modifier of horizontal. In light of this amendment and clarification, Applicants respectfully request that the objection to Claim 13 be withdrawn and that it be passed to allowance.

Claim 14 has been identified as being unclear in setting forth the structural relationship between the "multi-round filter housing" and the "cleaning wand." The preamble to Claim 14 is to a multi-round filter housing cleaning system; the cleaning wand is claimed as a component of that system.

Figure 4 depicts one aspect of the cleaning system contemplated by Claim 14. With reference to item 415 in Figure 4, it is identified in Paragraph [44] as "a spray device

assembly” – this is the cleaning wand element of Claim 14. If the examiner prefers *in hac verbis* language for this element, Applicants would consider amending Claim 14 accordingly for the sake of clarity.

Claims 15 and 16 were deemed unclear as to their respective scope and meaning.

Claim 15 further limits Claim 14 from which it depends by requiring the presence of two or more spray devices, elements identified in Figure 4 as item 419. As for a device to disperse a cleaner onto each interior surface, it is respectfully submitted that Paragraphs [44] and [45] set forth the requirements of such a device.

CLAIM REJECTIONS UNDER 35 U.S.C. § 102

Claims 1 and 4 were rejected under 35 U.S.C. § 102(a) and (b) as anticipated by the Allegheny Bradford Corporation Brochure cited by Applicants. As set forth in detail above, Applicants’ multi-round filter housing includes an integrated, one-piece, base assembly including an integral cartridge plate. It is clear from the cited reference that the cartridge plate is of separate construction, therefore it is not “integral” in the sense that Applicants have discussed above. Furthermore, Claim 1 has been cancelled from this application, and Claim 4 has been amended to depend from Claim 2. Independent Claim 21 has been added to further define an alternate embodiment regarding this aspect of Applicants’ multi-round filter housing. For all of these reasons, the Allegheny Bradford Corporation Brochure does not anticipate the currently pending claims, or new Claim 21, therefore this rejection should be withdrawn.

Claims 1, 4 and 9-12 have been rejected under 35 U.S.C. § 102(b) as being anticipated by the Pall Housing Data Sheets H21 and H25. Neither of the Pall Housing Data Sheets H21 or H25 show a one-piece base assembly, therefore these references do not anticipate Claims 1, 4, or 9-12. Furthermore, the description in both of these data sheets states that “a removable cartridge tube sheet is provided for easy cleaning.” This removable element is equivalent to the prior art separate cartridge plate - an element that is absent from Applicants’ invention. Accordingly, for the same reasons discussed above, withdrawal of this rejection is respectfully requested.

CLAIM REJECTION UNDER 35 U.S.C. § 103

The rejections of Claims 1-4 and 9-12 in Paragraphs 11, 12 and 13 of the Office Action are moot in light of the above amendments and remarks. Early notice of allowance of these claims is therefore respectfully requested.

OBJECTIONS TO THE SPECIFICATION:

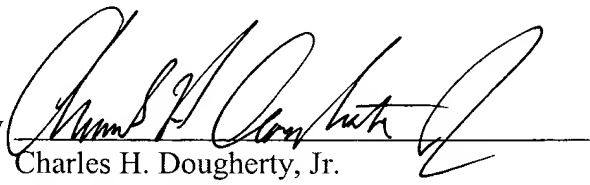
Applicants note with appreciation the Examiner's detailed outline of the preferred layout of a patent application. However, it is respectfully submitted that the information provided in Paragraphs [19] through [28] is properly placed under the section heading "DESCRIPTION OF THE PREFERRED EMBODIMENTS" for reasons set forth by the Examiner. Specifically, even though Figure 1 shows a prior art filter housing assembly, the components and elements shown therein aid in the description of Applicants' invention and thus clarify the scope and use of their invention. Reconsideration and withdrawal of this objection are respectfully requested.

CONCLUSION

All of the Examiner's concerns have been addressed by the above amendments, addition of new claims, and clarifying remarks. Because the above independent claims are clearly not anticipated or obvious in light of the cited references, all outstanding claims are in condition for allowance, and prompt notice to that effect is respectfully requested.

Respectfully submitted,

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